

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CITY OF ALMATY, KAZAKHSTAN and :  
BTA BANK, JSC, :

Plaintiffs, :

-against- :

FELIX SATER, DANIEL RIDLOFF, BAYROCK :  
GROUP INC., GLOBAL HABITAT SOLUTIONS, :  
INC., RRMI-DR LLC, FERRARI HOLDINGS :  
LLC, and MEM ENERGY PARTNERS LLC, :

Defendants. :  
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Case No. 19-civ-02645

**NOTICE OF MOTION  
FOR A STAY PENDING  
ARBITRATION**

**PLEASE TAKE NOTICE THAT**, upon the accompanying Declaration of Jill Levi dated August 19, 2019 and the Exhibit attached thereto, and the Affidavit of Felix Sater (“Sater”), sworn to August 19, 2019, and the Exhibits attached thereto, and upon Sater’s Memorandum of Law in Support of his Motion for a Stay Pending Arbitration, dated August 19, 2019, Sater, by his undersigned attorneys, Todd & Levi, LLP, will move (the “Motion”) this Court before Magistrate Judge Katherine Parker, at the Courthouse, 500 Pearl Street, New York, New York, 10007, for an order pursuant to 9 U.S.C.A. §3, the Federal Arbitration Act, and the inherent equitable powers of the Court, for a stay of this Action pending that certain Arbitration Proceeding brought by Litco LLC against the Plaintiffs before the American Arbitration Association or alternatively, if the entire Action is not stayed, then a stay of the claims asserted against Sater in this Action, and granting such other and further relief as this Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE**, that pursuant to the agreed upon briefing schedule, Plaintiffs are required to submit opposition, if any, to the Motion on or before September 11, 2019 and Sater shall submit a reply to such opposition, if any, on or before September 24, 2019.

Dated: New York, New York  
August 19, 2019

TODD & LEVI, LLP

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